| 1 2 3 4 | 123 West Prospect Avenue, Suite 250 Cleveland, Ohio 44115 216-621-9870 Fax: 216-522-1112 Email: ziggy@msablaw.com | | | |
|------------------|---|------------------------------------|--|--|
| 5 | | 2.4.1.2.1.1 | | |
| 6 | UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO-EASTERN DIVISION | | | |
| 7 | | se No. 1:14-cv-01374-DCN | | |
| 8 | ANTHONY REO; AND BRYAN) REO, INDIVIDUALLY AND ON) BEHALF OF ALL OTHERS) | | | |
| 9 | | | | |
| 10 | 10 vs. | V. W.O. D. V. W.O. D. O. | | |
| 11 | | N TO ADMIT COUNSEL PRO HAC VICE | | |
| 12 | 12 | | | |
| 13 | 13 | | | |
| 14 | 14 | | | |
| 15 | 15 | | | |
| 16 | PLEASE TAKE NOTICE that upon the annexed Declaration of Jeffrey A. Backman, | | | |
| 17 | Esq., in support of this Motion, we will move this Court pursuant to Rule 83.5(h) of the Local | | | |
| 18 | Civil Rules of the United States District Court for the Northern District of Ohio for an Order | | | |
| 19 | allowing the admission of Jeffrey A. Backman, Esq., a Shareholder of the firm of Greenspoon | | | |
| 20 | Marder, P.A. and a member of good standing of the Bar of the State of Florida, as attorney pro | | | |
| 21 | 21 | | | |
| 22 | 22 | | | |
| 23 | 23 | | | |
| 24 | 24 18996016v1 | | | |

hac vice to argue or try this case in whole or in part as counsel for Defendant Caribbean Cruise Line, Inc. There are no pending disciplinary proceedings against him any State or Federal court.

Respectfully submitted,

MCNEAL, SCHICK, ARCHIBALD & BIRO CO., L.P.A.

/s/Paul W. Ziegler
PAUL W. ZIEGLER (0012364)

ziggy@msablaw.com 123 West Prospect Avenue, Suite 250 Cleveland, OH 44115 (216) 621-9870 Attorney for Defendant

^{1.} By filing this Motion for Pro Hac Vice Admission, the Defendant does not waive any defense under Rule 12 of the Federal Rules of Civil Procedure, including the defense of lack of personal jurisdiction.

1 **CERTIFICATE OF SERVICE** 2 I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically 3 filed with the Clerk of Court by using CM/ECF service which will provide copies to all counsel 4 of record registered to receive CM/ECF notification on this Wednesday, August 06, 2014. 5 Abbas Kazerounian, Esq. Joshua B. Swigart, Esq. iosh@westcoastlitigation.com ak@kazlg.com 6 Matthew M. Loker, Esq. **HYDE & SWIGART** 2221 Camino Del Rio South, Suite 101 ml@kazlg.com 7 San Diego, CA 92108 KAZEROUNI LAW GROUP, APC (619) 233-7770 120 S. LaSalle Street, Suite 1800 8 (619) 297-1022 (FAX) Chicago, Illinois 60603-3593 (800) 400-6808 (800) 520-5523 (FAX) 10 Todd M. Friedman, Esq. 11 tfriedman@attorneysforconsumers.com LAW OFFICES OF TODD M. FRIEDMAN, P.C. 369 S. Doheny Dr., #415 12 Beverly Hills, CA 90211 (877) 206-4741 13 (866) 633-0228 (FAX) Attorney for Plaintiff Anthony Reo 14 15 16 17 /s/Paul W. Ziegler PAUL W. ZIEGLER (0012364) 18 19 20 21 22 23

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18996016vI

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PAUL ZIEGLER (0012364)
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 1
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 2
     216-621-9870
     Fax: 216-522-1112
 3
     Email: ziggy@msablaw.com
     Attorney for Defendant Caribbean Cruise Line, Inc.
 4
 5
                             UNITED STATES DISTRICT COURT
                   NORTHERN DISTRICT OF OHIO-EASTERN DIVISION
 6
 7
                                                  Case No. Case No. 1:14-cv-01374-DCN
     ANTHONY REO; AND BRYAN
 8
     REO, INDIVIDUALLY AND ON
     BEHALF OF ALL OTHERS
 9
     SIMILARLY SITUATED,
                  Plaintiffs,
10
           VS.
     CARIBBEAN CRUISE LINE, INC.,
                                                 DECLARATION
                                                                     IN
                                                                           SUPPORT
                                                                                        OF
11
                  Defendants.
                                                 MOTION FOR ADMISSION PRO HAC
                                                  VICE
12
13
14
15
16
     Pursuant to 28 U.S.C. § 1746, I, Jeffrey A. Backman, Esq., declare as follows:
17
           1.
                  My full name is Jeffrey A. Backman.
18
           2.
                 I am a Shareholder with the law firm of Greenspoon Marder, P.A.
19
           3.
                 I practice under the following firm name or letterhead:
20
                  Greenspoon Marder, P.A.
                  200 East Broward Boulevard
21
                  Suite 1800
                  Fort Lauderdale, Florida 33301
22
                  Telephone Number: (954) 491-1120
                  Facsimile: (954) 213-0140
23
                 Email address: Jeffrey.Backman@gmlaw.com
24
     18996108v1
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¹ Attached hereto is a copy of the Certificate of Good Standing from the Florida Bar.



JOHN F. HARKNESS, JR. EXECUTIVE DIRECTOR

651 East Jefferson Street Tallahassee, Florida 32399-2300

850/561-5600 www.FLORIDABAR.org

| County of Leon |) | | | |
|----------------|---|--------|--|--|
| | | In Re: | 662501 Jeffrey Aaron Backman Greenspoon Marder, P.A. | |

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

200 E. Broward Blvd., Ste. 1500

Fort Lauderdale, FL

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on September 29, 2003.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is an active member of The Florida Bar in good standing.

Dated this _____day of July, 2014.

Pam Gerard Member Services & Records Manager The Florida Bar

PG/CL:ksw1:R10